

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT  
ON STATUS AND RESOLUTION OF  
OMNIBUS OBJECTIONS WITH  
RESPECT TO CERTAIN CLAIMS**

**[Re: Docket Nos. 9466, 9702, 9888, and  
10287]**

**Regarding Objections Set for Hearing  
May 26, 2021 at 10:00 a.m. (Pacific Time)**

## **REPORT ON RESOLUTION OF CERTAIN CLAIMS**

In advance of the May 26, 2021, 10:00 a.m. omnibus hearing (the “**Hearing**”), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby report on the status and resolution of certain Claims in the following omnibus claims objections:

<b>Docket No.</b>	<b>Omnibus Objection</b>
9466	<i>Reorganized Debtors’ Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed Claims)</i> (the “ <b>Forty-Fifth Omnibus Objection</b> ”)
9702	<i>Reorganized Debtors’ Forty-Sixth Omnibus Objection to Claims (Books and Records Claims)</i> (the “ <b>Forty-Sixth Omnibus Objection</b> ”)
9888	<i>Reorganized Debtors’ Fifty-First Omnibus Objection to Claims (Books and Records Claims)</i> (the “ <b>Fifty-First Omnibus Objection</b> ”)
10287	<i>Reorganized Debtors’ Sixty-Second Omnibus Objection to Claims (Books and Records Claims)</i> (the “ <b>Sixty-Second Omnibus Objection</b> ”)

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
<b>Forty-Fifth Omnibus Objection</b>			
9619	Shou Kun Huang and Henry Huang	7920	The Reorganized Debtors have sent settlement agreements to the Claimants on March 1, 2021, April 6, 2021, and April 19, 2021, and followed up by telephone on April 23, 2021, May 5, 2021, and May 18, 2021. No response has been received to date. If the Reorganized Debtors do not receive a response, or if a consensual resolution has not been reached in advance of the Hearing, the Reorganized Debtors request that it be continued to June 15, 2021 at 10:00 a.m.
<b>Forty-Sixth Omnibus Objection</b>			
Informal	Hain Capital Holdings, LLC as Transferee of Hain Capital Investors Master Fund Ltd.	9634	The Forty-Sixth Omnibus Objection is WITHDRAWN with respect to this Claim. It will be allowed as filed.

Docket No.	Claimant	Claim No.	Resolution
<b>Fifty-First Omnibus Objection</b>			
Informal	Cosco Fire Protection, Inc.	69358 78400	The Reorganized Debtors have reached a settlement of these Claims that resolves the Fifty-First Omnibus Objection.
<b>Sixty-Second Omnibus Objection</b>			
10452	City of Santa Cruz	2838	The Reorganized Debtors have reached a settlement of this Claim that resolves the Sixty-Second Omnibus Objection.

**DECLARATION REGARDING STATUS AND RESOLUTION OF CLAIMS**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors

2. The foregoing status and resolution of certain Claims is true and correct to the best of my knowledge, information, and belief.

3. This declaration was executed in San Francisco, California.

Dated: May 20, 2021

**KELLER BENVENUTTI KIM LLP**

By: /s/ Dara L. Silveira  
Dara L. Silveira

*Attorneys for Debtors and Reorganized Debtors*